

From: Don McEnhill <rrkeeper@sonic.net>
To: "William Rodriguez" <WRodriguez@waterboards.ca.gov>
Date: 12/17/2009 10:45 AM
Subject: Re: City of Healdsburg, Draft Administrative Civil Liability Order

Hi Bill,

Thank you for providing a copy of the ACL and proposed SEP. We would be prepared to support the proposed SEP strongly on the urban reuse side.

We are currently working with Clean Water Coalition of Northern Sonoma to condition their proposed Syar Ag irrigation project as it poses the exact type of risk that was anticipated by the State recycled water policy as posing a significant potential risk of groundwater contamination due to very coarse gravelly soils over very shallow groundwater of potable or better quality and since grapevine root membranes only accept water and nutrients and will reject other pollutants not removed at plant they will be driven down to groundwater. Without more fully characterizing effluent quality, performing a water balance to determine potential for accumulation and conducting groundwater monitoring we will vigorously oppose any attempt to use Hbg effluent in alluvial soils of middle reach in the floodplain. The goal of reuse is to increase total supply and if we degrade groundwater we are reducing net potable supplies.

So while we'd support the proposed SEP on urban irrigation side since soils in Hbg proper are not alluvial and have significant clay/organic content we want to see more information and proactive monitoring before any AG irrigation moves ahead. While the Hbg plant produces a higher quality effluent than SR in most constituents it is only 10-35% lower in pollutants we are most concerned about.

We have been talking to the City staff and Council about this issue so they should be clear about where we come from on this issue.

I'm scrambling with year-end grant reports so hope to get a formal letter out first week of January once I have a clearer idea of the SEP proposal.

THanks & Happy Holidays & Furloughdays,
Don

On Dec 17, 2009, at 10:14 AM, William Rodriguez wrote:

> Hello Don:
>
> Attached is the draft ACLO and associated documents for the City of
> Healdsburg. The Regional Water Board will be considering adoption
> of the Order on January 21, 2010. Call or email me if you have any
> questions or comments.
>
> bye, Bill R...
>
>
> Bill Rodriguez
> Regional Water Quality Control Board, North Coast Region